



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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815-223-1714

EPA Region 5 Records Ctr.



303019

March 24, 2008

Mr. Keith Wilcoxson
SECOR International Incorporated
446 Eisenhower Lane North
Lombard, Illinois 60148

Refer to: 2010300074—Winnebago County
Southeast Rock Groundwater Contamination Site
Hamilton Sundstrand, Area 9-10
Superfund/Technical Reports [GMZ letter]

Dear Mr. Wilcoxson:

The Illinois Environmental Protection Agency (Illinois EPA) has reviewed the comments on the document entitled "Revised Groundwater Management Zone Application Remedial Design Area 9/10", submitted by you on behalf of Hamilton Sundstrand ("H/S") dated March 7, 2008. Previous letters have been sent by Illinois EPA to HS commenting on the Application for a Groundwater Management Zone pursuant 35 Ill. Adm. Code 620.250. A letter sent by Illinois EPA dated January 16, 2008 includes conditions to meet 35 Ill. Adm. Code 620.250 for a GMZ. Other letters sent by the Illinois EPA regarding the Groundwater Management Zone (GMZ) include letters dated February 28, 2007 and the November 29, 2007. The February 28, 2007 letter contained Illinois EPA's comments on the Groundwater Management Zone ("GMZ") application that was submitted by H/S dated November 30, 2006. Additionally, Illinois EPA and H/S have met to discuss conditions necessary for the establishment of the GMZ. A review of this Revised Groundwater Management Zone Application dated March 7, 2008 indicates that the GMZ cannot be approved at this time.

1. Section 1.1 entitled, Purpose of the GMZ Application, states, "The purpose of this document is to provide the necessary information for USEPA approval (with concurrence from the "Illinois Environmental Agency", (*sic*) to establish a three dimensional region containing groundwater being managed to mitigate impairment caused by a release of contaminants from the Site in general accordance with 35 Illinois Administration Code (IAC) Part 620.250."

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There are two problems with this statement. First, Illinois EPA, not USEPA, approves the GMZ pursuant to 35 Ill. Adm. Code Part 620. Secondly, the statement that the application is in “general” accordance with 35 Ill. Adm. Code 620.250 is not acceptable. To state that the application is in “general” accordance with 35 Ill. Adm. Code 620.250 implies that not all requirements of 35 Ill. Adm. Code 620.250 will be followed. For the Illinois EPA to approve the GMZ application, it must meet all requirements of 35 Ill. Adm. Code 620.250 and other regulatory requirements as further set forth in the Illinois EPA letter to you dated January 16, 2008.

2. Hamilton Sundstrand shall resubmit an application that fully addresses the conditions set forth in the January 16, 2008 letter.
3. Section 1.1 of the Revised Application on page 1-2 states: “This application contains the information to determine the adequacy of controls and the management of the GMZ at the Site associated with the RD and future Remedial Action “RA” activities for the Site.”

The GMZ application as submitted does not sufficiently explain the “adequacy of controls”; i.e., it does not include any detail regarding the monitoring groundwater (*see* section 2.2 (f) of your GMZ application). The GMZ application is a stand alone document and shall include all information required to support approval of the GMZ application.

4. Section 2.2 of the revised application describes the proposed monitoring well network for the GMZ. This section also should describe the current monitoring network and sampling protocols.
5. Section 2.2(f) - As previous Illinois EPA comments indicate, groundwater shall be monitored at least semi-annually pursuant to 35 Ill. Adm. Code Part 725, during the time the GMZ is in effect.
6. Section 2.4(a) mentions soil removal as part of the RD at the loading dock area yet the loading dock area is not previously mentioned as a potential source area. Please make this consistent throughout the document.
7. Section 2.4(e) - The GMZ will remain in place until the Illinois EPA determines that it is no longer required.
8. In addition, Section 2.4 e does not provide the necessary information to evaluate any future groundwater monitoring at the Site.
9. Section 2.4(f) is designed to provide information regarding the adequacy of the controls and management of the GMZ; however, there is insufficient information to evaluate this for approval. Specific information, including groundwater monitoring protocols, frequency of groundwater monitoring, frequency of

reporting, and the manner in which analytical results will be reported, shall be provided in the final GMZ application.

10. Section 2.4(g) – Regarding Illinois EPA's role in approving GMZ modifications, see comment 1 above. All requests for modification of any portion of the GMZ shall be made in writing to the Illinois EPA.
11. Section 2.5 Point of Compliance--As previously discussed, the Illinois EPA requires that the perimeter of the GMZ be monitored, particularly in the down gradient direction. As such, it may be necessary in the future to add SMW-5, located at the southwest corner of the GMZ, to the GMZ monitoring well network.

If you would like to discuss any of these comments, or the comments in Illinois EPA's January 16th letter, please contact me before March 28, 2008, at 815-223-1714. Additionally, please provide the Illinois EPA with 3 copies of your revised GMZ application within twenty-one (21) days of the date of this letter. Mail two copies to Springfield, Illinois and the third copy to Thomas C. Williams, LPG, Illinois EPA Project Manager, PO. Box 1515, LaSalle, Illinois 61301-3515.

Sincerely,



Thomas C. Williams LPG.
National Priorities List Unit
Federal Sites Remediation Section
Division of Remedial Management
Bureau of Land

cc: Bureau of Land File
Terry Ayers NPL unit
Paul Jagiello DLC DesPlaines Regional Office
Shari Kolak SR6J US.EPA Region V Chicago, IL
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